



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

SK/MEL/PBW  
F.#2015R01313

*271 Cadman Plaza East  
Brooklyn, New York 11201*

April 11, 2018

SENSITIVE DISCOVERY MATERIALS

By Email

Anthony L. Ricco  
20 Vesey Street  
Suite 400  
New York, NY 10007

Re: United States v. Ali Saleh  
Criminal Docket No. 15-517 (S-1) (WFK)

Dear Counsel:

Please find enclosed additional discovery in the above-referenced matter. Specifically, please find enclosed:

- Records of Twitter postings from the defendant's co-conspirators, Bates numbered 19051 to 19055; and
- An affidavit in support of an application for a search warrant, Bates numbered 19056 to 19102.

The enclosed materials are provided pursuant to the Protective Order Pertaining to Unclassified Information entered by the Court on November 16, 2015 (the "Order"). Materials designated SENSITIVE DISCOVERY MATERIALS must be handled as provided in the Order. The government renews its request for reciprocal discovery.

The government previously provided notice that it expects to call Lorenzo Vidino as an expert regarding the Islamic State of Iraq and al-Sham ("ISIS"). See ECF No. 63. The government hereby provides notice that it may call Alexandra Kassirer as a substitute for, or as a supplement to, Dr. Vidino, on the same subjects. The government does not intend to introduce redundant testimony but provides notice of Ms. Kassirer's possible testimony in an abundance of caution, in the event there are scheduling or other limitations applicable to Dr. Vidino's testimony. Attached, for your reference, is Ms. Kassirer's

curriculum vitae, marked as 3500-AK-1, and Ms. Kassirer's recent testimony in another matter, marked 3500-AK-2.

Very truly yours,

RICHARD P. DONOGHUE  
United States Attorney

By: /s/  
Saritha Komatireddy  
Margaret E. Lee  
Peter W. Baldwin  
Assistant U.S. Attorneys  
(718) 254-7000

Enclosures

cc: Clerk of the Court (WFK) (by ECF) (without enclosures)